

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

Plaintiff

-against-

NAVEED ALI BHINDAR,

Defendant,
-----X

DOCKET.: 07-CR-711 (LAP)

RELATED TO: 11-CV-3944 (LAP)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 6/30/15

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JUN 30 A 9:08

RESPONSE TO ORDER TO SHOW CAUSE

I, UZMAH SAGHIR, on May 21, 2015, were served with an Order to Show Cause for refund of allegedly unearned attorney fees to the Defendant at the office space I maintain at 591 Stewart Ave, Suite 513, Garden City, NY 11530.

I write to seek an extension of time to file a response the Order.

The Order stated I had 30 days to Show Cause as to why this Show Cause should be dismissed. However, a pre-existing injury to my right shoulder has recently gotten worse and I had to go to see a doctor on June 4, 2015. I was prescribed medication to help with the pain and inflammation and the doctor ordered an MRI of the shoulder. I do not like to have x-rays or MRI/s done so I told the doctor that I would rest my shoulder and take the medication to see if it helps ease the pain so I can then get physiotherapy. The doctor offered to give a sick note for work but I told her I did not need one as I do not work for anyone, I do freelance work independently.

From June 4, 2015 until today I have been home pretty much resting my shoulder and also fighting a viral infection I developed since then due to the change in the weather or something of that nature.

In the midst of this my memory did not serve me correctly and I wrongfully believed that I was served with the Order to Show Cause on May 28, 2015 rather than May 21, 2015. I had taken note of the allegations in the Order and had left the Order in my office. I returned today to the office intending to write to the Court to seek an extension of time to respond to the Order and realized that my response was overdue.

I am attaching a copy my MRI prescription the doctor ordered of my right shoulder, I do not have a copy of the prescription of the medications I am taking,


nor do I have a doctors note. However if the Court wishes I can try to obtain the same from my doctor.

In light of my medical condition and the confusing of the date of service of the Order, I respectfully ask the Court to consider this application for an extension of time to respond the Order timely.

The reason I seek the extension of time to file the response is that this a old case. I cease to practice in the Southern District in 2009, the file of the defendant I believe is either in storage or was surrendered to the Defendant when I ceased my practice. I have been looking for the file but have not been able to locate the file thus far. I need to review the file before I can fully respond to the motion. Some of my files were lost or destroyed in the midst of moving them. I hope the Defendant's file was not one of them. Further, I need to investigate the representations the Defendant makes regarding his conversations with Darmin T. Bachu, Esq.

Therefore I respectfully ask that the Court grant a 60 day extension from the date of this letter response to file the response to the Order.

Dated: June 26, 2015
Garden City, New York


Uzma Saghir, Pro Se
591 Stewart Ave, Suite 513
Garden City, NY 11530

SW CNYRxPadM/782036 P Pad 14 of 20 12/3/2014 N

OFFICIAL NEW YORK STATE PRESCRIPTION

3

DAN LU MD
 LIC: 211410
 NPI: 1811052293

199 HEMPSTEAD TURNPIKE WEST HEMPSTEAD, NY 11552 (516) 565-4110

PRACTITIONER DEA NUMBER

Patient Name

Saghar, Urmal Date 6/4/15

Address

City

State

Zip

Age

Sex

M F

Rx

MRZ of B Shroter
 without consent

☐

Preferred Language

Prevent medication errors. Please see back of prescription.

Prescriber Signature X

 MAXIMUM DAILY DOSE
 (controlled substances only)

THIS PRESCRIPTION WILL BE FILLED GENERICALLY UNLESS PRESCRIBER WRITES "dow" IN THE BOX BELOW

REFILLS

☐ None

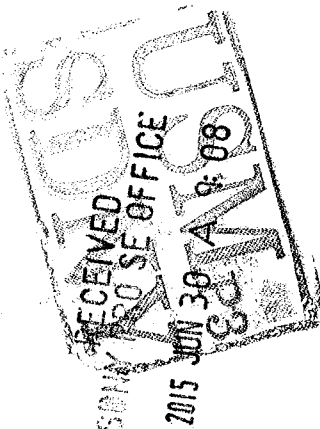
Refills:

0852M7 56

 PHARMACIST
 TEST AREA:

Dispense As Written

Hizmah Sahir
591 Stewart Ave
Suite 513
Garden City, NY 11530



Pro Se Clerk
United States District Court
Southern District of New York
500 Pearl St
New York, NY 10007

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